

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----	X
In re	: Chapter 7
	: :
CHRISTINE PERSAUD,	: Case No. 10-44815 (ESS)
	: :
	: :
Debtor.	: :
-----	X

**AFFIRMATION OF AURORA CASSIRER IN RESPONSE TO THE
FURTHER OBJECTION OF ABRAHAM KLEIN TO THE TRUSTEE’S
APPLICATION TO RETAIN TROUTMAN SANDERS LLP**

**TO THE HONORABLE ELIZABETH S. STONG
UNITED STATES BANKRUPTCY JUDGE**

AURORA CASSIRER, an attorney admitted to the bar of the State of New York, affirms
as follows:

1. I am a member of the firm of Troutman Sanders LLP (“Troutman”), and serve as
managing partner of the firm’s New York office. I make this affirmation in reply to the further
objection of Abraham Klein to the firm’s retention as substitute counsel to the Trustee.

2. In his papers, Mr. Klein questions the ability of my partner, John Campo, to speak
to the facts concerning Troutman Sanders’ representation of Global Realty Ventures, LLC
(“GRV”), an entity in which Mr. Klein has an interest. I was Mr. Campo’s source of information
concerning this prior representation, and I can confirm that the information Mr. Campo has
provided to the Court is accurate.

3. Although I am familiar with the firm’s prior representation of GRV, Mr. Klein
overstates my involvement with that project when he describes me as the “point person” on that
matter. I am a litigator, and I lacked the expertise to assist GRV with the legal issues associated
with a business venture in China. Accordingly, my partner, Edward Epstein of our Shanghai
office, along with a former Troutman associate, Tian Wang, performed all of the legal services

that Troutman provided to GRV. Although these two attorneys apparently copied me as a courtesy on some of their correspondence with GRV, I never performed any substantive legal work on the matter, never billed any time to the client in connection with the prior representation, and never became privy to any confidential information.

4. Moreover, I am certainly not aware of any confidential information obtained in the course of the firm's representation of GRV or, in fact, any information that would have any bearing or relevance to the firm's proposed representation of the Trustee in this case. Mr. Epstein, the partner who did the legal work for GRV, will not have any involvement in this bankruptcy case, and, although we do not believe it is necessary, we will put in place an "ethical wall" so the persons representing the Trustee will have no contact with Mr. Epstein concerning the bankruptcy case or the prior representation of GRV. Mr. Wang, the associate who worked on the GRV matter, has left the firm, so he obviously will not be involved in the bankruptcy representation.

Dated: New York, New York
September 7, 2011

s/Aurora Cassirer
Aurora Cassirer
Troutman Sanders LLP
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
(212) 704-6075